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7 **UNITED STATES DISTRICT COURT**  
 8 **NORTHERN DISTRICT OF CALIFORNIA**  
 9

10 Pacific Information Resources, Inc., a  
 11 California Corporation,

12 Plaintiff,

13 vs.

14 SIMPLE COMMUNICATIONS, an Alabama  
 15 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 16 UNKNOWN,

17 Defendants.

18 ) **CASE NO. CV-07-4131 MMC**  
 ) **[Before the Honorable Maxine M.**  
 ) **Chesney, Courtroom 7]**  
 )  
 ) **PLAINTIFF'S RESPONSE TO OSC RE:**  
 ) **DEFAULT JUDGMENT AND REQUEST**  
 ) **TO CONTINUE DATE FOR FILING**  
 ) **MOTION FOR DEFAULT JUDGMENT**  
 ) **AGAINST WILLIAM TRAVIS**  
 ) **SULLIVAN AND SIMPLE**  
 ) **COMMUNICATIONS; ORDER THEREON**  
 )  
 ) Complaint Filed: August 9, 2007  
 ) Discovery Cut-Off: N/A  
 ) Trial: N/A  
 ) Status Conference: February 1, 2008

20 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR**  
 21 **ATTORNEYS OF RECORD HEREIN:**

22 Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance  
 23 of the Court to file its Default Judgment Application on February 1, 2008 instead of on  
 24 December 21, 2008. Plaintiff makes this request on the basis of good cause in that extrapolating  
 25

26  
 27 **Plaintiff's Response to Osc Re: Default Judgment and Request to Continue Date for Filing**  
 Motion for Default Judgment

28 **Case No. CV-07-4131**  
 pacific information resources\pleadings\sullivan and simple communications\resp to osc and req to cont date for def judg final as filed 01 10 08

1 the voluminous data necessary to support the Default Judgement which will be in excess of \$3  
 2 million has taken more time than anticipated.

3 Moreover, in order to satisfy the stringent requirements for obtaining the Default  
 4 Judgment, additional documentation and discovery by Plaintiff has been required. Indeed, one of  
 5 Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the University of  
 6 Melbourne in Australia until June, 2008. Thus, coordinating with Professor Hadas has been a  
 7 time consuming logistical challenge.

8 Plaintiff apologizes to the Court for this belated request.

9 There will be no prejudice to any party who has direct or related interest in this case,  
 10 including those parties who are Defendants in the related case noted herein.

11 Plaintiff humbly request this extension in order to properly comply with all statutory and  
 12 local criteria for granting the Default Judgment Application.

13 Respectfully submitted,

14 DATED: January 10, 2008

**NOVO LAW GROUP, P.C.**

15 BY: /s/Konrad L. Trope, Esq.  
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 24 INFORMATION RESOURCES,  
 25 INC.

26 **PROPOSED ORDER**

27 Plaintiff Pacific Information Resources has hereby requested continuance to file its  
 28 Default Judgment Application against Defendants William Travis Sullivan and Simple  
 29 Communications to February 1, 2008.

1 Having considered the requested extension, good cause appearing, therefore, and no  
2 prejudice any parties appearing, IT IS HEREBY ORDERED that:

3 Plaintiff shall file its Application for Default Judgment not later than February 1, 2008.

4 Dated: January 11, 2008

  
5 Honorable MAXINE M. CHEANEY  
6 United States District Judge